

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GTECH CORPORATION,

Plaintiff,

v.

C.A. No. 04-138-JJF

SCIENTIFIC GAMES INTERNATIONAL,
INC., SCIENTIFIC GAMES HOLDINGS
CORPORATION, SCIENTIFIC GAMES
FINANCE CORPORATION, and
SCIENTIFIC GAMES CORPORATION,

Defendants.

SCIENTIFIC GAMES' PROPOSED VOIR DIRE

Pursuant to D. Del. L.R. 47.1(a), defendants Scientific Games International, Inc., Scientific Games Holdings Corporation, Scientific Games Finance Corporation, and Scientific Games Corporation (collectively, "Scientific Games") submit the following proposed voir dire for the Court's consideration, in addition to any standard voir dire questions posed by the Court:

1. You have been given a list of companies.

a. Are you personally acquainted with any officer, director, or employee of any of the companies?

b. Have you, any family member or anyone close to you had any dealings with, or financially relied upon any of the companies in any way?

c. Have you, any family member or anyone close to you ever used any products of one of the companies?

2. Are you related to, personally acquainted with, or have you hired or been adverse to any of the attorneys or law firms in this case?

3. Are you related to or personally familiar with any of the potential witnesses in the case?

4. Do you know anything about this case already? Have you read or heard about it? Do you have any opinions about the case?

5. Have you ever been a plaintiff, defendant or witness in a civil lawsuit?

6. Have you ever served as a juror in a civil lawsuit?

7. Have you or any relative or friend ever been employed, trained or had experience in the legal profession such as working in a law office or with an attorney?

8. As to the list of subject matters, have you, a close friend or relative ever been employed, trained or had experience in any of the subject matters?

9. Have you, any relative or friend ever obtained a patent, worked for a company with patents or worked for a company that has been involved in a patent infringement suit?

10. Do you have any strong opinions about government-run lotteries?

11. Do you have any strong opinions about gambling?

12. Do you regularly purchase lottery tickets?

12. Is there any matter that you would like to discuss with the Court concerning your experience or ability to be a juror in this case or that would prevent you from giving a fair and unbiased verdict based solely on the evidence and the Court's instructions?

Companies

GTECH Corporation
Scientific Games International, Inc.
Scientific Games Holdings Corporation
Scientific Games Finance Corporation
Scientific Games Corporation

Attorneys and Law Firms

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Jack B. Blumenfeld
Rodger D. Smith II
MORRIS, NICHOLS, ARSHT & TUNNELL

List of Potential Witnesses

[to be added]

Subject Matters

Lotteries
Instant scratch-off lottery tickets
Vending machines
Mechanical engineering
Human-computer interaction
Computer graphics
Patents and patent law

MORRIS, NICHOLS, ARSHT & TUNNELL

/s/ Rodger D. Smith II

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January 13, 2006
499298

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 13, 2006, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

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and that I caused copies to be served upon the following in the manner indicated:

BY HAND

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